

PAR4.1.25
CEM/JK: USAO# 2025R0149

OSDC-BALTIMORE
25 APR 2 PM1:03

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

**DANIEL LARA-SALAZAR,
Defendant.**

CRIMINAL NO.

HJM-25-85

(Coercion and Enticement, 18 U.S.C. § 2422(b) and 2427; Aiding and Abetting, 18 U.S.C. § 2; Sexual Exploitation of a Child, 18 U.S.C. § 2251(a) and (e); Receipt of Child Pornography, 18 U.S.C. §§ 2252A(a)(2) and (b)(1); Forfeiture, 18 U.S.C. §§ 2428 and 2253, 21 U.S.C. §2461(c))

INDICTMENT

COUNTS ONE TO TWELVE
(Coercion and Enticement)

The Grand Jury for the District of Maryland charges that:

General Allegations

At times material to this Indictment:

1. Defendant **DANIEL LARA-SALAZAR** (hereinafter “**LARA-SALAZAR**”) was born in 1993, and resided in Puyallup, Washington. **LARA-SALAZAR** was an active member of the United States Army.
2. Minor Victim 1 was a 12-year-old female and was a resident of Frederick, Maryland.
3. From in or about June 2024 to in or about September 2024, **LARA-SALAZAR** operated and used an online Snapchat account. **LARA-SALAZAR** used the Snapchat handle “perplex33” to communicate with other social media users. Beginning no later than June 2024, **LARA-SALAZAR** often used this account to meet and/or communicate with children.

4. **LARA-SALAZAR** used his Snapchat account to persuade, induce, entice, and coerce the minor victim to engage in sexually explicit conduct. During these internet-based communications, **LARA-SALAZAR** caused, and attempted to cause the minor victim to produce images that depicted the minors engaged in sexually explicit conduct, including masturbation and the lascivious display of the minor's genitals. He also used Snapchat in order to receive depictions of the minor victim engaging in sexually explicit conduct, including the lascivious displays of the minor victim's genitals and masturbation.

The Charges

5. On or about the dates listed below, each instance being a separate count, in the District of Maryland and elsewhere, the defendant,

DANIEL LARA-SALAZAR,

did knowingly use, and attempt to use, a facility and means of interstate and foreign commerce to knowingly persuade, induce, entice and coerce a minor to engage in sexual activity for which any person could be charged with a criminal offense, to wit: on or about the dates listed below, **LARA-SALAZAR** used, and attempted to use, an internet-based Snapchat account to persuade, induce, entice and coerce Minor Victim 1 to engage in sexually explicit conduct on camera and to send **LARA-SALAZAR** visual depictions of the conduct via the internet, in violation of 18 U.S.C. §§ 2251(a) and 2252A(a)(2), and Md. Code, Crim. Law § 11-207(a)(1), as follows:

Count	Date
1	June 9, 2024
2	June 17, 2024
3	June 18, 2024
4	June 20, 2024
5	June 21, 2024
6	June 25, 2024

Count	Date
7	June 27, 2024
8	July 11, 2024
9	July 13, 2024
10	July 14, 2024
11	July 15, 2024
12	July 18, 2024

18 U.S.C. §§ 2422(b) and 2427

18 U.S.C. § 2

COUNT THIRTEEN
(Sexual Exploitation of a Minor)

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in paragraphs One through Four of the General Allegations of this Indictment are incorporated here.

2. On or about July 18, 2025, in the District of Maryland and elsewhere, the defendant,

DANIEL LARA-SALAZAR,

did knowingly attempt to and did employ, use, persuade, include, entice, and coerce Minor Victim 1 to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such a visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and such visual depiction have actually been transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate or foreign commerce, and which visual depictions were produced using materials that have been mailed, shipped and transported in and affecting interstate and foreign commerce, by any means, including by computer, to wit: video files depicting Minor Victim 1 masturbating her exposed genitals and engaging in sex acts with a canine, titled “dc2c6f21-eb0c-4951-acdd-d0120dd6a37c”; and “51710c4f-cb83-48ad-b50c-77df5f9e8e92,” respectively.

18 U.S.C. § 2251(a) and (e)
18 U.S.C. § 2

COUNTS FOURTEEN TO FIFTEEN
(Receipt of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in paragraphs One through Four of the General Allegations of the Indictment are incorporated here.
2. On or about the dates listed below, each being a separate count, in the District of Maryland and elsewhere, the defendant,

DANIEL LARA-SALAZAR,

did knowingly receive, and attempt to receive, any visual depiction using any means and facility of interstate and foreign commerce, and that had been mailed and had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so mailed, and so shipped and transported, by any means including by computer, the production of which visual depiction involved the use of a minor engaged in sexually explicit conduct and which visual depiction was of such conduct: to wit, **LARA-SALAZAR** used his Snapchat internet-based account to receive visual depictions of Minor Victim 1 engaged in sexually explicit conduct, as follows:

Count	Date	Description
14	July 15, 2024	A series of video files depicting Minor Victim 1's exposed genitals and Minor Victim 1 masturbating her exposed genitals.
15	July 18, 2024	A series of video files depicting Minor Victim 1's exposed genitals and Minor Victim 1 masturbating her exposed genitals and engaging in sex acts with a canine.

18 U.S.C. §§ 2252A(a)(2) and (b)(1)

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. §§ 2253 and 2428, 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), in the event of the defendant's convictions on any of the offenses charged in Counts One through Fifteen of this Indictment.

Coercion and Enticement Forfeiture

2. Upon conviction of any of the offenses alleged in Counts One through Twelve of this Indictment, the defendant,

DANIEL LARA-SALAZAR,

shall forfeit to the United States, pursuant to 18 U.S.C. § 2428(a):

a. any interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such offense(s); and

b. any property, real or personal, constituting or derived from any proceeds that such person obtained, directly or indirectly, as a result of such offense(s).

Sexual Exploitation of Children and Receipt of Child Pornography Forfeiture

3. Upon conviction of any of the offenses set forth in Counts Thirteen through Fifteen of this Indictment, the defendant,

DANIEL LARA-SALAZAR,

shall forfeit to the United States, pursuant to 18 U.S.C. § 2253(a):

a. any visual depiction described in Title 18, United States Code, Sections, 2251, 2251A, 2252, or 2252A, 2252B, or 2260 or any book, magazine, periodical, film, videotape, or

other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, received, or possessed in violation of Title 18, United States Code, Chapter 110;

- b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense(s); and
- c. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense(s), or any property traceable to such property.

Substitute Assets

4. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be subdivided without difficulty;

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. §§ 2253(b) and 2428(b) and 28 U.S.C. § 2461(c).

18 U.S.C. §§ 2253 and 2428

21 U.S.C. § 853(p)

28 U.S.C. § 2461(c)

Kelly O. Hayes /RM
Kelly O. Hayes
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

FOREPERSON

4/11/2025

Date